

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

STAVANGER HOLDINGS, LTD and KARL)
ANDERSEN,)
Plaintiffs,)
v.)
CASE NO. 1:12-cv-0646 WTL-MJD
TRANEN CAPITAL, LTD., TRANEN)
CAPITAL ALTERNATIVE INVESTMENT)
FUND, LTD., THE LEO GROUP, LLC,)
KENNETH A. LANDGAARD, ARTHUR L.)
BOWEN, AND RANDY W. BAGLEY,)
Defendants.)

MOTION TO DISMISS AMENDED COMPLAINT

Defendants Tranen Capital, Ltd., Tranen Capital Alternative Investment Fund, Ltd., Kenneth A. Landgaard and Arthur L. Bowen, (the “Tranen Defendants”), by counsel and pursuant to F.R.Civ.P. Rule 12(b)(6), move to dismiss the Amended Complaint on file herein. The ground for this motion is that the Amended Complaint fails to state a valid claim for breach of contract as to the Tranen Defendants because the contract which was alleged to have been breached shows on its face that the Tranen Defendants are not parties to the contract. Further grounds for this motion are set forth in the following memorandum of points and authorities in support of this motion.

FROST BROWN TODD LLC

By: /s/ Thomas E. Satrom
Thomas E. Satrom, #20745-49

Attorneys for Defendants Tranen Capital, LTD., Tranen Capital Alternative Investment Fund, LTD, Kenneth A. Landgaard, and Arthur L. Bowen

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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